

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

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In re

CITY OF DETROIT, MICHIGAN,

Debtor.

: Chapter 9

: Case No. 13- 53846

: Hon. Steven W. Rhodes

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**STIPULATION BETWEEN THE CITY OF DETROIT AND
SYNCORA GUARANTEE INC. REGARDING DOCUMENTS
TO BE PRODUCED BY THE DETROIT FIRE DEPARTMENT**

Syncora Guarantee Inc. and the City stipulate and agree that the City will not be required to perform a full search of all electronically stored information of the Detroit Fire Department (“DFD”), but instead will produce the following DFD documents for the period from January 1, 2013 through April 16, 2014:

1. Documents showing each of the classes of new recruits that started at the Fire Academy
2. Documents showing each of the classes of new recruits that started at the EMS Academy
3. Report showing all new hires by the Fire Department and EMS
4. Documents regarding the number of applications submitted by prospective employees (both Fire and EMS), including the number of applicants for each position
5. Documents showing the city and state of residence of job applicants
6. Documents showing the level of educational attainment of job applicants, by position

7. Documents regarding the winter 2014 job fair held at Cobo Hall, in which the Fire Department participated
8. Documents relating to opportunities for promotion within the Fire Department
9. Report showing all separations (including retirement, voluntary and involuntary separations)
10. Retirement requests by employees
11. Notices of employee resignations
12. Documents tracking grievances filed by employees
13. Reports showing response times for both Fire and EMS, including changes in those response times
14. Statistics on the number of calls responded to by Fire and EMS
15. Reports/memoranda addressing equipment, fleet and manpower needs, including memoranda prepared in conjunction with consultants from Conway MacKenzie
16. The “Timeline for Improvement of EMS”
17. Documents relied on in creating the Timeline for Improvement of EMS

Respectfully submitted,

Dated: June 20, 2014

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